

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

\_\_\_\_\_  
Appeal from Charleston County

R. Ferrell Cothran, Circuit Court Judge  
\_\_\_\_\_

**ORIGINAL**

IN THE MATTER OF THE CARE AND  
TREATMENT OF TIMOTHY J. BROWN,

**RECEIVED**

OCT 09 2019

APPELLANT SC Court of Appeals

APPELLATE CASE NO. 2019-000821  
\_\_\_\_\_

PETITION FOR EXTENSION TO FILE  
INITIAL BRIEF OF APPELLANT  
AND DESIGNATION OF MATTER  
\_\_\_\_\_

The undersigned counsel respectfully requests a thirty-day extension in which to file the initial brief of appellant and designation of matter in the above-referenced case. In support of this motion, counsel would respectfully show the Court the following extraordinary circumstances:

1. The initial brief of appellant and designation of matter in this case are due to be served and filed today.

2. Counsel filed the Anders brief of appellant and designation of matter in the case of In the Matter of the Care and Treatment of Donald Donald Hulon with the Court of Appeals on September 16, 2019. Counsel filed the initial brief of appellant and designation of matter in the case of The State v. Dameon Brown with the Court of Appeals on September 4, 2019. Counsel filed the return to petition for rehearing in the case of The State v. Vladimir Pantovich with the Supreme Court on August 29, 2019. Counsel filed the brief of petitioner in the case of The State v. Robin Herndon with the Supreme Court on August 20, 2019. Counsel filed the

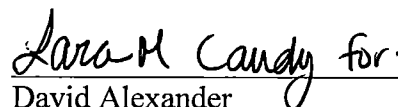
Anders brief of appellant and designation of matter in the case of The State v. Michael Collins with the Court of Appeals on August 7, 2019. Counsel filed the return to petition for rehearing in the case of The State v. Anthony Martin with the Supreme Court on August 2, 2019.

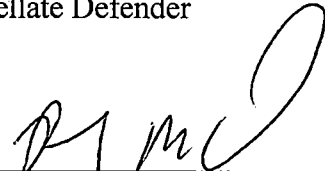
3. This request is made in good faith, and not for purposes of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

4. As indicated by the counsel below, counsel for the state graciously consents to or does not oppose this request.

WHEREFORE, the undersigned counsel would respectfully request a thirty-day extension. Counsel respectfully requests that the time limits for filing the initial brief of appellant and designation of matter be held in abeyance pending a ruling on this motion.

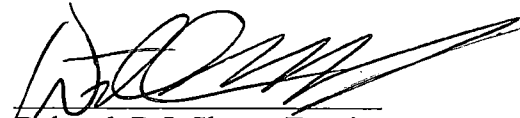
Respectfully submitted,

  
\_\_\_\_\_  
David Alexander  
Appellate Defender

  
\_\_\_\_\_  
Robert M. Dudek  
Chief Appellate Defender

This 9<sup>th</sup> day of October, 2019.

I do not oppose:

  
for \_\_\_\_\_  
Deborah R.J. Shupe, Esquire